

## **REMARKS**

This communication is in response to the Office Action dated June 15, 2006. Applicant once again respectfully traverses the rejections. The references are newly-cited in the present Office Action.

Basically, Applicant's argument is that the Examiner must torture and cajole the disclosure of the newly-cited references in order to come up with something that is alleged to disclose the claimed subject matter. Even at that, the disclosure falls far short.

Taking Applicant's claim 1, this claim recites (in part) "starting an intermediary software component within the isolated execution unit newly-created by the external program" and "starting the target software component . . . within the isolated execution until newly-created by the external program."

The Examiner contends, relative to the Chan reference, that the enterprise bean 138 is the newly-created isolated execution unit. That is, the Examiner cites "creating a new isolated execution unit [instantiating an enterprise bean 138; col. 7, lines 15-33]." The Examiner also seems to be alleging that the "target software component" is the "reusable software component" mentioned at the cited "col. 6, line 42 – col. 7, line 16." Unfortunately, though, the "reusable software component" being referred to in the cited portion of Chan is the enterprise bean. It does not make sense for the enterprise bean to be both the "newly-created isolated execution unit" and the "target software component."

For example, Chan's col. 1, lines 5-10 recites:

TECHNICAL FIELD. This invention relates generally to the field of distributed computing and more particularly relates to facilitating access to and use of reusable software components, such as Enterprise JavaBeans (EJB) components.

Chan's col. 2, lines 7-8 recites:

An enterprise bean is a reusable development component in a client/server environment that is designed according to Sun Microsystems' Enterprise JavaBeans specification . . .

There are numerous other references in Chan to the reusable software component being the enterprise bean. Thus, at least since it is illogical for the enterprise bean 138 to be both the "newly-created isolated execution unit" and "the target software component," Chan fails to properly support the Examiner's rejection.

Furthermore, the Examiner's allegation with regard to motivation to combine Toutonghi and Chan is insufficient. The Examiner notes that Toutonghi discloses:

Thus, there is a need for a technique that allows software developers to map between component models developed in different development environments that can provide for

a more complete mapping of component objects and information within the object, while reducing the development and maintenance overhead of current mapping techniques. However, as best understood by Applicant, Chan does not disclose mapping “between component models defined in different development environments,” so it is not clear how this statement in Toutonghi suggests modifying Chan at all.

Thus, in summary, the combination of Chan and Toutonghi does not yield the subject matter of claim 1. Furthermore, contrary to the motivation to modify Chan in view of Toutonghi alleged by the Examiner, there is no proper motivation to make such a modification.

### **CONCLUSION**

Applicant believes that all pending claims are allowable and respectfully requests a Notice of Allowance for this application from the Examiner. Should the Examiner believe that a telephone conference would expedite the prosecution of this application, the undersigned can be reached at the telephone number set out below. For example, if the Examiner can suggest claim amendments that are considered to put the claims in condition for allowance, Applicant respectfully requests the Examiner to contact the undersigned.

Respectfully submitted,  
BEYER WEAVER & THOMAS, LLP

/ASH/  
Alan S. Hodes  
Reg. No. 38,185

P.O. Box 70250  
Oakland, CA 94612-0250  
(650) 961-8300